

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KATIE GHERTNER,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION NO.: 1:19-CV-02295
v.	:	
	:	
CORPORATE ENVIRONMENTS	:	
OF GEORGIA, INC.,	:	
	:	
Defendant.	:	
	:	

**DEFENDANT CORPORATE ENVIRONMENTS STATEMENT OF
MATERIAL FACTS AS TO WHICH GENUINE ISSUES EXIST FOR
TRIAL**

COMES NOW, CORPORATE ENVIRONMENTS OF GEORGIA, INC.

(hereinafter “Corporate Environments”) Defendant in the above-styled action,
and shows the Court that genuine issues exist for trial as to the following material
facts so as to preclude the granting of Plaintiff’s motion:

1. Whether the Project Designer position was an equivalent position to the
A&D position;
2. Whether the Project Designer position compensation was equivalent to the
A&D position;

3. Whether the Project Designer position benefits was equivalent to the A&D position;
4. Whether the Project Designer position status and privileges was equivalent to the A&D position;
5. Whether the Project Designer position status and privileges was equivalent to the A&D position;
6. Whether the Project Designer position involved substantially similar duties.

This 10th day of March, 2020.

Respectfully submitted,

s/ Alexandra Bowen Higgins

ALEXANDRA BOWEN HIGGINS

Georgia State Bar No. 071105

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	:	
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CERTIFICATE OF SERVICE

This is to certify that on March 10, 2020, I served all counsel of record in the foregoing matter with a copy of **DEFENDANT CORPORATE ENVIRONMENTS OF GEORGIA, INC.'S STATEMENT OF MATERIAL FACTS AS TO WHICH GENUINE ISSUES EXIST FOR TRIAL**

via electronic mail as follows:

COUNSEL FOR PLAINTIFF
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This 10th day of March, 2020.

Respectfully submitted,

By: *s/Alexandra Bowen Higgins*
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